

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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SUPERB MOTORS INC., TEAM AUTO SALES LLC,  
ROBERT ANTHONY URRUTIA, 189 SUNRISE HWY  
AUTO LLC, NORTSHORE MOTOR LEASING, LLC,  
BRIAN CHABRIER, individually and derivatively as a  
member of NORTSHORE MOTOR LEASING, LLC,  
JOSHUA AARONSON, individually and derivatively as a  
member of 189 SUNRISE HWY AUTO, LLC, JORY  
BARON, 1581 HYLAN BLVD AUTO LLC, 1580 HYLAN  
BLVD AUTO LLC, 1591 HYLAN BLVD AUTO LLC, 1632  
HYLAN BLVD AUTO LLC, 1239 HYLAN BLVD AUTO  
LLC, 2519 HYLAN BLVD AUTO LLC, 76 FISK STREET  
REALTY LLC, 446 ROUTE 23 AUTO LLC and ISLAND  
AUTO MANAGEMENT, LLC,

Plaintiffs,

-against-

ANTHONY DEO, SARAH DEO, HARRY THOMASSON,  
DWIGHT BLANKENSHIP, MARC MERCKLING,  
MICHAEL LAURIE, THOMAS JONES, CPA, CAR  
BUYERS NYC INC., GOLD COAST CARS OF SYOSSET  
LLC, GOLD COAST CARS OF SUNRISE LLC, GOLD  
COAST MOTORS AUTOMOTIVE GROUP LLC, GOLD  
COAST MOTORS OF LIC LLC, GOLD COAST MOTORS  
OF ROSLYN LLC, GOLD COAST MOTORS OF  
SMITHTOWN LLC, UEA PREMIER MOTORS CORP.,  
DLA CAPITAL PARTNERS INC., JONES, LITTLE & CO.,  
CPA'S LLP, FLUSHING BANK, LIBERTAS FUNDING  
LLC, and J.P. MORGAN CHASE BANK, N.A.,

Defendants.

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**PLEASE TAKE NOTICE** that upon the Declaration of Emanuel Kataev, Esq., dated December 11, 2023, the exhibit annexed thereto, and the accompanying Memorandum of Law, Plaintiffs shall move this Court at the United States District Court for the Eastern District of New York, located at 100 Federal Plaza, Central Islip, NY 11722-4438, on a date and time to be set by the Court, for an Order, pursuant to Rule 15(a)(2) of the Federal Rules of Civil Procedure, granting Plaintiffs leave to file a Second Amended Complaint in this case, and for such other and further relief as this Court may deem just, equitable, and proper.

Case No.: 2:23-cv-6188 (JMW)

**PLAINTIFFS' NOTICE OF CROSS-  
MOTION FOR LEAVE TO  
AMEND THE COMPLAINT**

Dated: Lake Success, New York  
December 11, 2023

Respectfully submitted,

**MILMAN LABUDA LAW GROUP PLLC**

By: /s/ Emanuel Kataev, Esq.

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Robert Anthony Urrutia*

Dated: New York, New York  
December 11, 2023

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/s/

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1239 Hylan Blvd Auto LLC,  
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